

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNITED STATES OF AMERICA, et al.,
ex rel. CALEB HERNANDEZ and JASON
WHALEY, Relators

Plaintiffs,

v.

TEAM HEALTH HOLDINGS INC., et al.

Defendants.

CASE NO. 2:16-cv-00432-JRG

DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE
DEFENDANTS' REPLIES UNDER SEAL

Defendants, Team Health Holdings, Inc., Team Finance, L.L.C, Team Health, L.L.C., AmeriTeam Services, L.L.C., HCFS Health Care Financial Services, L.L.C. and Quantum Plus, L.L.C. (collectively, "Team Health" or "Defendants"), hereby file this Unopposed Motion for Leave to File Defendants' Reply in Support of their Motion for Summary Judgment, Defendants' Reply in Support of their Motion to Exclude the Opinion Testimony of Relators' Designated Statistical Expert Douglas Steinley, and Defendants' Reply in Support of their Motion to Exclude the Opinion Testimony of Relators' Designated Experts Kristen Folding and Bruce Wapen (collectively, "Replies"), and attachments thereto, Under Seal.

Defendants' Replies contain highly confidential information. Therefore Defendants respectfully move for leave to file the Replies under seal. Relators do not oppose this motion.

Defendants respectfully request that the Court enter the attached Order granting leave to file Defendants' Reply in Support of their Motion for Summary Judgment, Defendants' Reply in Support of their Motion to Exclude the Opinion Testimony of Relators' Designated Statistical

Expert Douglas Steinley, and Defendants' Reply in Support of their Motion to Exclude the Opinion Testimony of Relators' Designated Experts Kristen Folding and Bruce Wapen, and attachments thereto, under seal.

Dated: October 9, 2020

Respectfully submitted,

By: /s/Eric H. Findlay

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CERTIFICATE OF CONFERENCE

This is to certify that counsel for Defendants have complied with the meet and confer requirement in Local Rule CV-7(h). The personal conference required by Local Rule CV-7(h) was conducted on October 9, 2020. Relators have indicated they are unopposed to this motion.

/s/ Eric H. Findlay
Eric H. Findlay

CERTIFICATE OF SERVICE

This is to certify that on October 9, 2020, all counsel of record were served with the foregoing document *via* CM/ECF and electronic mail.

/s/ Eric H. Findlay
Eric H. Findlay